REMARKS

Claims 6 and 7 are amended for purposes of clarification and not for purposes of patentability. No amendment of claims 6 and 7 is thought to be necessary because the original claims are understood to be reasonably clear to those skilled in the art. However, the claims are amended for purposes of expediting prosecution. Also, claims 3, 6 and 10 were amended to correct a typographical error.

Claims 1-16 remain pending in the application. Reconsideration and allowance of the application are respectfully requested.

The Office Action fails to establish that claims 1-6, 8-11 and 13-16 are anticipated under 35 U.S.C. §102(e) by "Nishigaya" (US patent publication 2001/0010056 to Nishigaya et al). The rejection is respectfully traversed because the Office Action fails to show that all the limitations of the claims are taught by Nishigaya.

Among others, the limitations of claim 1 not shown to be taught by Nishigaya include one or more of the response definitions including one or more commands and instructions for queuing a command to a command queue having storage available for a plurality of commands; for the pattern definitions that match the messages, adding associated commands to the command queue in processing the response definitions; and dequeuing commands from the command queue and issuing the commands to the computing arrangement. None of the cited teachings of Nishigaya contain any apparent reference to response definitions that include instructions for queuing a command to a command queue.

For example, the Office Action cites Nishigaya's paragraph [0069] as teaching these limitations. However, this paragraph appears to discuss pattern matching and associated actions; there is no apparent correspondence of any element in this paragraph to the claimed instructions for queuing a command to a command queue. Furthermore, the cited paragraphs [0070] and [0075] do not in any apparent way suggest the claimed dequeuing of commands from the command queue. Again, there is no apparent correspondence to the claimed command queue. If the rejection is

maintained, an explanation is requested for the specific elements of Nishigaya thought to correspond to the claim limitations. Otherwise, the rejection should be withdrawn.

The limitations of claim 2 are similarly not shown to be taught by Nishigaya's paragraph [0075]. Claim 2 includes limitations of dequeuing a command from the command queue and submitting the command to the computing arrangement in processing the response definition associated with the pattern definition that matches a command prompt message. Nishigaya does not in any apparent manner suggest dequeuing commands from a command queue for submitting to a computing arrangement, even though Nishigaya teaches performing actions in response to a matched pattern. The claims draw a clear distinction between the response definitions in the pattern database and the commands in a command queue that result from the actions. The Office Action fails to recognize the distinction in rejecting the claims.

The Office Action fails to show that Nishigaya teaches the limitations of claim 3, including, for example, commands for high-level operation of a data storage system. The cited paragraphs [0106]-[0130] of Nishigaya describe input patterns of actions, an event object class, and general pattern matching. There are no apparent elements that correspond to the claimed commands for high-level operation of a data storage system. An explanation is requested for the specific elements of Nishigaya thought to correspond to these limitations if the rejection is maintained. Otherwise, the rejection should be withdrawn.

Claims 4, 5, 6, 8, 9, 10, and include limitations that further refine the limitations discussed above, and claims 13-16 are apparatus claims that include functional limitations similar to those discussed above. Therefore, the Office Action fails to show that Nishigaya teaches the limitations of these claims.

The Office Action does not establish that claims 1-6, 8-11 and 13-16 are anticipated by Nishigaya. Further clarification is requested if the rejection is maintained. Otherwise the rejection should be withdrawn.

The Office Action fails to establish that claims 7 and 12 are unpatentable under 35 U.S.C. §103(a) over Nishigaya as applied to claims 1-6, 8-11 and 13-16, in view of "Li" (US patent 6,374,207 to Li et al.). The rejection is respectfully traversed because

the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Nishigaya with teachings of Li, and fails to show that the combination could be made with a reasonable likelihood of success.

The Office Action fails to show that Nishigaya teaches the limitations of the base claim and intervening claims for claims 7 and 12 as explained above.

The alleged motivation for combining Li with Nishigaya is conclusory and improper. The alleged motivation states that "it would have been obvious ... to implement Nishigaya method employing terminal emulation session to establish a connection between the operation processor and the data storage device, in order to improve the interaction between a client an a resource by allowing accessing and sending command to the resource remotely." This alleged motivation does not present any evidence that Nishigaya's system is deficient in any way in the manner of "interaction between a client and a resource." Nor is any evidence presented to indicate which elements of Nishigaya's system would be improved. Furthermore, without such evidence it is not apparent that the combination could be made with a reasonable likelihood of success.

The rejection of claims 7 and 12 over the Nishigaya-Li combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success.

No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.028PA).

Respectfully submitted,

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